

**Conference Call Between
Veolia Environmental Services (Veolia) and EPA**

March 8, 2012 (10:00 am – 12:00 noon)

Call-in information:

Toll-free dial-in number: (877) 226-9607
Participant conference code: 6693830375

1. Introductions
2. Purpose of the call
3. Veolia's significant modification request
 - a. Extrapolation of metal feed rates
 - What is EPA's position on Veolia's proposed extrapolation rates?
 - b. Feedstream Analysis Plan
 - 40 C.F.R. §63.1209(c) requires each subject facility to have a feedstream analysis plan (FAP) "that is sufficient to document compliance with the applicable feed rate limits." What is EPA's position on Veolia's FAP?
 - c. Ongoing enforcement issues
 - As part of an enforcement investigation, the National Enforcement Investigations Center (NEIC) inspected Veolia's Sauget facility in late 2008. How could the findings of that investigation affect EPA's decision on the significant modification request?
4. Other topics as necessary

Table 1. Veolia's Proposed Operating Parameter Limits (OPLs)

Col. ID	1	2	3	4	5	6	7	8
Unit #	Metal	Metal Feed Rates During 2008 Testing (lb/hr) ^a	EPA Revised Metal Feed Rates During 2008 Testing (lb/hr) ^b	Highest 12-hr Rolling Average Metal Feed Rate 7/1/04-1/1/08 (lb/hr)	Test Feed Rate As a % of the Highest 12-hr Rolling Average of Historical Values	Veolia's 3/2/10 Proposed Extrapolated Feedrate (lb/hr) ^c	Est. Stack Conc. @ Veolia's Proposed OPLs (µg/dscm @ 7% O ₂) ^d	HWC MACT Limit (40 C.F.R. § 63.1219); µg/dscm @ 7% O ₂
2	Hg	0.00185	0.00165	0.0054	34%	0.0057	182	130
	LVM	46.8	47.2	84.5	55%	140	20	92
	SVM	62.9	63.6	50.6	124%	189	65	230
3	Hg	0.00185	0.0018	0.00545	34%	0.0057	178	130
	LVM	47.7	47.7	77.3	62%	143	70	92
	SVM	64.3	64.3	72.1	89%	193	173	230
4	Hg	0.026	0.0214	0.05981	43%	0.078	87	130
	LVM	50.3	50.3	69.9	72%	151	30	92
	SVM	63.6	63.6	58.4	109%	191	81	230

Table Notes:

- Feed rate calculated by EPA (& proposed by Veolia in the 2010 application) from offsite spike rates and PSC Republic's moisture content.
- Feed rate calculated by EPA in March 2010 using calculated Hg spike composition & offsite waste feed concentrations.
- Calculated by escalating the metal feed rate during testing (Column 2) by a factor of 3.
- Stack concentrations are estimated from exhaust parameters and the "removal efficiencies" reported by Veolia in the March 2010 application.